

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNION DEL PUEBLO ENTERO, et al.,
Plaintiffs,

v.

GREGORY W. ABBOTT, et al.,
Defendants.

§
§
§
§
§
§
§

Case No. 5:21-cv-844-XR

STATE DEFENDANTS’ OBJECTIONS TO PLAINTIFFS’ DEPOSITION DESIGNATIONS

Defendants Gregory W. Abbott, in his official capacity as Governor of Texas, Jane Nelson, in her official capacity as Secretary of State, Angela Colmenero, in her official capacity as Provisional Attorney General of Texas, and the State of Texas (“State Defendants”) make the following objections to Plaintiffs’ Deposition Designations:

Rep. Rafael Anchia	
Plaintiffs’ Designations	Defendant’s Objections
8:1-4	Relevance
9:14-18	
11:12-25	
12:1-7, 13-15, 21-25	
13:1-8	13:7-8 – Hearsay
17:7-8, 13, 16-18	17:7-8, 13 – Cumulative
18:3-7, 12-19	
19:12-23	
20:11-18	20:16-18 – Lack of Personal Knowledge/Speculation
21:8-10, 16-22	
23:17-25	
24:1-16	24:8-16 – Lack of Personal Knowledge/Speculation
30:24-25	
31:1-19	31:4-19 – Hearsay

Rep. Rafael Anchia	
Plaintiffs' Designations	Defendant's Objections
32:13-16, 20-24	Hearsay
33:11-17, 21-25	31:11-17 – Lack of Personal Knowledge/Speculation 31:21-25 – Hearsay, Lack of Personal Knowledge/Speculation
34:1, 3-6, 18-25	34:1, 3-6 – Hearsay, Lack of Personal Knowledge/Speculation 34:18-25 – Lack of Personal Knowledge/Speculation
35:1-7, 12-17, 20-25	Lack of Personal Knowledge/Speculation
36:1-14	Lack of Personal Knowledge/Speculation
77:3-20	77:13-15 – Lack of Personal Knowledge/Speculation
78:9-11	
82:10-15	Hearsay
84:10-25	84:10-16 – Hearsay
85:1-4	
91:22-25	
92:1-5, 8-25	
93:1-8	

Rivelino Lopez	
Plaintiffs' Designations	Defendant's Objections
20:18-25	
21:1-25	
22:1-25	
23:1-25	
24:1-25	

Rep. Andrew Murr ¹	
Plaintiffs' Designations	Defendant's Objections
19:13-16	
42:11-18	
43-8-14	
47:20-48:8	Relevance
53:7-12	
55:7-24	Relevance
59:22-60:23	60:3-23 – Relevance
86:19-87:14	87:7-14 – Relevance
88:5-89:25	88:18-19 – Foundation, Speculation. 89:9-14 – Foundation, Speculation. 89:15-25 – Relevance
94:20-95:6	Relevance
95:22-96:12	Relevance
96:23-100:2	
100:3-101:25	101:14-25 – Relevance
102:5-7	
103:17-104:5	103:23-5 – Relevance
104:15-105:20	105:12-20 – Relevance
106:22-112:22	107:8-16 – Relevance 108:23-109:6 – Relevance 109:16-110:5 – Relevance 112:16-22 – Relevance
113:8-13	
114:4-117:22	115:20-116-5 – Relevance 117:7-22 – Relevance
120:2-123:18	122:3-20– Assumes Facts Not in Evidence; Misstates Testimony in Record 123:9-18 – Relevance
136:13-137:13	Relevance
137:14-143:4	138:10-19 – Legal Conclusion, Vague, Relevance 138:20-139:2 – Vague, Relevance 139:3-19 – Legal Conclusion, Vague 139:20-140:16 – Vague 141:17-143:4 – Relevance
143:5-144:14	143:5-11 – Legal Conclusion, Vague 143:22-14 – Relevance

¹ Many of Plaintiffs' designations reference questions that implicated the legislation privilege. State Defendants raised the necessary objections during the deposition, and the witness refrained from answering on the advice of counsel. The invocation of legislative privilege is not evidence of facts germane to the claims and defenses in this case. Plaintiffs have not contested State Defendants assertions of legislative privilege in this deposition. State Defendants therefore object to these designations as irrelevant and maintain that the assertion legislative privilege was appropriate.

Rep. Andrew Murr¹	
Plaintiffs' Designations	Defendant's Objections
144:15-146:17	144:15-145:7 – Legal Conclusion, Vague 145:17-146:17 - Relevance
146:18-148:3	146:18-24 – Legal Conclusion, Vague 146:25-147:10 – Legal Conclusion, Vague, Assumes Facts in Evidence 147:14-148:3 – Relevance
148:4-149:14	148:4-11 – Legal Conclusion, Vague 148:412-18 – Legal Conclusion 148:25-149:14 – Relevance
149:15-150:9	149:25-9 – Relevance
152:19-22	
154:4-155:3	

Maria Gomez	
Plaintiffs' Designations	Defendant's Objections
5:1-5	
6:10-7:1-3	
7:9-9:15	
9:19-11:9	
11:15-12:10	
12:20-13:8	
13:16-18	
13:25-14:4	
14:10-23	
15:17-20	
15:25-16:8	
16:18-20	
17:2-22	
18:3-17	
19:1-12	
19:21-20:9	
20:22-21:24	21:16-19 Hearsay; Lack of Personal Knowledge
22:7-24	22:7-21 – Hearsay
23:13-18	
24:3-25:10	
25:23-27:22	
28:2-22	
29:4-5	Optional Completeness (Full Citation 29:3-8)
29:9-30:1	

Maria Gomez	
Plaintiffs' Designations	Defendant's Objections
32:2-8, 17-20	
32:24-33:6	
33:13-36:18	
36:25-37:2	
37:7-14	
37:18-38:4	
38:8-10	
38:24-40:1	
40:13-18	
40:24-41:3	
41:24-42:24	
43:4-44:9	
44:23-46:4	
46:13-47:9	
48:11-50:2	49:14-50:2 – Lack of Personal Knowledge, Speculation
51:13-52:10	
52:17-19	
54:3-15	
54:19-58:19	

Cindy Siegel	
Plaintiffs' Designations	Defendant's Objections
12:1-17, 22-25	
13:25-14:20	
15:1-7	
19:1-20:14	19:1-3 - Optional Completeness (Full Citation 18:18-19:3)
21:5-17	
21:24-22:1	
22:25-23:2	
23:6-12	
24:12-19	
27:3-28:6	
28:10-29:18	
31:2-9	Vague, Ambiguous
32:13-34:25	
35:12-38:10	36:11-37:9 – Hearsay
41:13-22	
42:10-47:25	

Cindy Siegel	
Plaintiffs' Designations	Defendant's Objections
48:13-50:14	
51:3-52:21	
53:3-58:11	
59:9-61:21	
62:15-65:11	
65:17-67:19	65:17-22 – Hearsay
68:5-23	
70:18-72:17	
75:20-76:15	
89:1-91:2	
91:6-95:15	

Alan Vera	
Plaintiffs' Designations	Defendant's Objections
10:6-14:9	
16:25-19:11	
20:15-22:1	
22:6-14	
23:2-20	
24:8-28:9	
28:14-29:17	
29:23-30:1	
30:7-31:2	
31:9-32:17	
32:24-36:9	32:24-33:22 – Legislative privilege 34:4-35:18 – Legislative privilege
36:21-38:6	
39:7-45:17	
45:24-47:8	
47:21-49:7	
49:11-52:22	49:11-22 – Speculation
53:7-58:13	
59:15-61:10	
64:13-24	
65:5-66:11	
67:5-68:9	
68:13-70:6	
71:10-74:20	
75:3-85:17	
87:2-10	

Alan Vera	
Plaintiffs' Designations	Defendant's Objections
88:8-89:3	
89:10-90:2	
92:14-93:21	
95:10-98:11	
98:18-21	
99:16-101:20	
103:1-8	
104:24-106:17	
107:22-108:10	
108:17-109:6	
112:2-113:22	
114:13-116:2	
116:18-22	
117:5-118:19	
119:24-120:5	
121:2-7, 22-25	
122:1-124:5	
124:19-126:4	
128:5-132:17	
133:5-134:19	
135:1-17, 19-25	
136:1-137:24	
138:10-139:5	
140:3-140:20	
141:16-144:17	
144:24-145:6	
145:14-146:24	

Sen. Brian Hughes	
Plaintiffs' Designations	Defendant's Objections
6:1-4	
40:2-41:2	
41:20-42:8	
47:19-48:9	
55:18-56:8	
58:9-59:24	
92:17-94:24	
110:21-111:7	
118:1-119:12	
127:2-129:9	

Sen. Brian Hughes	
Plaintiffs' Designations	Defendant's Objections
132:29-136:19	
137:2-138:10	
138:25-141:19	
157:23-160:13	
160:18-161:13	
161:14-162:22	
163:6-18	
164:7-166:9	164:13-165:1 – Relevance; unnecessarily repetitive; asked and answered
168:2-169:21	
171:10-172:20	
173:25-174:17	
174:19-175:22	
175:24-25	
176:11-178:8	
181:10-183:21	
193:12-194:7	
199:19-207:5	
208:9-211:24	
212:16-217:8	
249:8-252:10	
255:18-259:2	258:6-259:2 – Incomplete hypothetical; vague
259:20	
262:13	
297:6-14	
298:5-20	
302:16-24	

Juanita Valdez Cox	
Plaintiffs' Designations	Defendants' Objections
66:2-25	None.
67:1-15	None.
69:8-25	69: 12-14 Nonresponsive 69: 19-21 Nonresponsive
70:1-17	None.

Taylor Scott	
Plaintiffs' Designations	Defendants' Objections
5:1-4	None.
7:19-23	None.
10:8-25	None.
11:1-5	None.
14:7:9	None.
15:3-4	None.
16:1-11, 18-24	Nonresponsive after first word in line 21.
18:24-25	None.
19:1-25	None.
20:1-4	None.

Hilda Salinas	
Plaintiffs' Designations	Defendants' Objections
6: 4-5, 15-17	None.
10: 20–13:2	None.
13:12-14:	None.
16:21–17:7	None.
22:9–23:4, 23:20-22	None.
26:4–11, 26:19-27: 1	26; 24-24 and 27:1 – Vague, nonresponsive.
33:16–35: 5	33: 22-25, 34: 1-4 – Vague, nonresponsive.
35:10-13	None.
36:9–38:24	37:1-15 – Nonresponsive. 37: 22-25, 1-15 – Vague, nonresponsive. 37:20-24 – Vague, nonresponsive.
39:14-20	None.
41:9–43:10	42: 14-23 – After first word, vague and non-responsive.
46:6-18	None.
53:7–54:16	None.
65:16-23	None.
66:1-3	None.
67:10-15, 20-22, 68:7–69:18	68:11-25, 69:1-18 – Vague, nonresponsive.
70:1–75:11	71: 2-7 – After first word, vague and nonresponsive. 73:17-25, 74:11-4 – Improper hypothetical question, calls for speculation.
76:1–20	76: 1-13 – Nonresponsive. 76:15-20 – Question is vague, response is vague and nonresponsive.
77:18–23	None.

Hilda Salinas	
Plaintiffs' Designations	Defendants' Objections
78:16–79:22	None.
81:25–88:22	86:7-17 – Vague, answer is nonresponsive after first word. 87:16-21 – Vague, nonresponsive.
90:19–91:4	None.
92:5–102:22	92: 14-20 – Nonresponsive after first word. 94:14-18 – Vague and nonresponsive.94:25, 95:1-25, 96:1 – The document speaks for itself; no question is asked regarding the document. 96:14-25, 97:1-25, 981-6 – Question and answer are vague. 100: 18-24 – Document speaks for itself; no question is asked regarding the document.
103:8–106:24	104:13-20 – Vague. 105:7-10 – Vague. 106: 5-19 – Vague and nonresponsive.
107:17–114:18	108:4-12 – Vague and nonresponsive. 108:13-25, 1109:1-3 – Vague and nonresponsive.
123:16–124:5	123: 16-23 – Vague and unintelligible.
124:11-22	124: 11-22 – Vague and nonresponsive.
125:1-9	None.
126:12–127:24	127:5-24 – Asked and answered.
128:12-14	None.
129:9–131:8	129:9 -22 – Nonresponsive. 129:23–130:15 – Nonresponsive after first word of answer. 130:16-19 – Calls for speculation as to what others felt. 130:220-25, 131:1-8 – Calls for speculation as to what others felt and nonresponsive.
131:20-132:23	131:20-25, 132:1-12 – Hearsay. 132:13-21 – Hearsay.
133:6–134:1	133:13-16 – Improper hypothetical.
134:11-136:9	134:11-17 – Hearsay. 134:18-25, 135: 1-23 – Calls for speculation and improperly inquires about 2020.
136:14 - 24	Hearsay, based on unauthenticated document. Vague as to whether question is as to legality prior or after S. B. 1.
137:24-140:9	139:17-24 – Answer is nonresponsive.
141:9–142:12	None.
145:23–146:2	None.

Hilda Salinas	
Plaintiffs' Designations	Defendants' Objections
147:15-25	Hearsay.
148:8-22	None.
151:1-14	None.
151:19-152:9	None.
153:10-154:12	None.
155:1-156:5, 156:24-157:6	None.
157:7-22	157: 11-16 – Calls for speculation as to what “office” thinks.
161:9-23	None.
172:7-173:15	None.
184:8-185:3	None.
191:15-23	None.
195:2-196:17	196: 9-17 – Answer is nonresponsive after first word.
197:6-20	197:6-20 – Answer is nonresponsive after first line.

Sen. Carol Alvarado	
Plaintiffs' Designations	Defendant's Objections
11:11-12:14	Relevance
16:7-21	
190:14-25	

Yvonne Iglesias	
Plaintiffs' Designations	Defendant's Objections
7:2-6	
18:12-17	
19:8-14	Optional Completeness (19:15-20)
21:6-22:1	
22: 3-5	
23:10-17	
25:8-15	
28:11-20	
29:4-11,	
29:15-30:3	
30:10-23	
32:1-7	

Yvonne Iglesias	
Plaintiffs' Designations	Defendant's Objections
34:25-35:2	
35:6-15	
39:18-21	
40:3-9	
41:24-42:20	Optional Completeness (41:15-23)
44:22-45:11	
46:24-47:25	Optional Completeness (48:1-5)
64:18-21	Optional Completeness (64:12-65:24)
68:25-69:7	Optional Completeness (69:8-13)
71:12-72:18	
75:5-76:2	

Rep. Nicole Collier	
Plaintiffs' Designations	Defendant's Objections
6:5-11	Relevance
14:9-22	Relevance
18:18-20:18	
22:18-23:25	Relevance
81:4-82:11	81:4-82:1 – Hearsay; Lack of Personal Knowledge
87:1-88:11	Lack of Personal Knowledge; Hearsay
136:10-137:10	Lack of Personal Knowledge; Hearsay
148:6-151:7	148:6 – 149:15 – Hearsay; 149:16-150:4 – Lack of Personal Knowledge; 151:4-7 – Lack of Personal Knowledge
154:17-157:25	156:7-157:3 – Hearsay; 157:18-25 – Hearsay
234:11-236:6	234:11-235:18 – Relevance; Lack of Knowledge; 235:19-236:6 – Hearsay

Rep. Briscoe Cain	
Plaintiffs' Designations	Defendant's Objections
7:12-15	Optional Completeness (Full Citation 12:9-17)
36:13-15, 18-19	
42:6-19	
43:5-13	
43:22-44:1	

Rep. Briscoe Cain	
Plaintiffs' Designations	Defendant's Objections
44:24-45:23	Optional Completeness (Full Citation 44:24-45-25)
52:21-53:6-54:25	
55:15-56:5	Relevance
56:11-57:19	57:8-19 – Relevance
65:5-66:9	65:24-9 – Relevance
67:16-68:7	
69:5-16	Relevance
80:25-82:2	Relevance
91:9-13	
93:5-25	Relevance
95:21-96:3,	
96:21-22	
96:24-97:2	
97:16-21	(Optional Completeness (Full Citation 97:10-11, 16-21)
97:24-98:9	
100:20-101:20	Relevance
102:12-103:20	Relevance
104:10-105:2	Relevance
111:24-113:4	Relevance
114:6-116:18	114:6-114:10 – Optional Completeness (Full Citation 113:5-114:10) 114:11-116:18 – Relevance
117:1-14, 117:24-118:19	117:9-14, 117:24-118:2 – Speculation, Lack of Foundation 118:3-19 - Relevance
119:7-8	
119:20-22	
119:25-120:17	
124:7-125:13	
125:18-126:8	
126:12-18	
126:23-127:18	
127:22-128:6	
131:9-132:22	
133:25-134:25	
135:5-138:17	
139:9-15	
139:21-141:19	139:21-141:1 - Relevance
142:14-143:3	142:21-3 – Relevance
143:16-144:14	Relevance

Rep. Briscoe Cain	
Plaintiffs' Designations	Defendant's Objections
145:4-146:5	
150:23-25	
154:20-156:4	
156:22-157:24	157:9-24 - Relevance
171:2-9	Optional Correctness (Full Citation 170:11-171:16)
172:23-173:6	Relevance
176:21-177:25	
178:11-14	
179:23-183:19	180:3-181:4 – Relevance 181:9-18 – Relevance 181:22-182:8 – Relevance 183:4-19 – Relevance
208:4-16	
208:12-20	Relevance

Dr. Douglas Kruse	
Plaintiffs' Designations	Defendant's Objections
7:4-18	
16:18-25	
17:9-12	
17:20-18:8	
22:8-18	
24:7-10, 16-21	
25:9-12	
26:2-13	
28:4-7	Optional Completeness (Full Citation 27:1-28:7)
28:21-29:4, 8-19	
31:5-12	Optional Completeness (Full Citation 31:5-13)
32:4-13	Optional Completeness (Full Citation 32:3-13)
32:22-33:25	
34:1-19	Optional Completeness (Full Citation 34:2-19)
37:7-8, 13-15	Optional Completeness (Full Citation 37:6-15)
42:1-15	Optional Completeness (Full Citation 41:16-42:15)
44:1-19	
47:6-10, 12-18	
54:6-16	Optional Completeness (Full Citation 54:5-16)
54:21-55:7	
59:3-15	

Dr. Douglas Kruse	
Plaintiffs' Designations	Defendant's Objections
62:24-63:5	
63:23-64:16	Optional Completeness (Full Citation 63:6-64:16)
65:10-25	
72:10-21	
73:12-74:11	
76:6-15	
77:19-78:21	
79:6-80:3	
84:5-85:6	
86:4-87-7	
87:23-88:17	
88:21-89:15	
89:22-90.2	
91:16-92:8	
95:15-96:2	Optional Completeness (Full Citation 95:15-96:5)
106:14-19	
110:8-111:15, 18-23	Optional Completeness (Full Citation 110:8-111:23)
112:7-12	
114:21-115:6, 10-12	Optional Completeness (Full Citation 114:21-115:12)
115:20-116:19	
118:10-119:1	
120:11-121:1	Optional Completeness (Full Citation 120:3-121:1)
121:15-122:3	
122:14-21	Optional Completeness (Full Citation 122:9-22)
124:21-125:1	Optional Completeness (Full Citation 124:16-125:1)
126:2-9	Optional Completeness (Full Citation 125:18-126:9)
127:8-11	Optional Completeness (Full Citation 127:1-11)
128:11-129:3	
132:14-20	
133:2-6	
140:22-141:5	
156:9-22	
156:25-157:5	
157:13-23	
158:19-159:1	

Dr. Douglas Kruse	
Plaintiffs' Designations	Defendant's Objections
164:6-15	Optional Completeness (Full Citation 164:6-17)
165:19-167:5	
167:25-168:8	Optional Completeness (Full Citation 167:25-168:17)
169:8-24	
172:12-21	
173:5-9	Optional Completeness (Full Citation 173:1-9)
173:21-25	Optional Completeness (Full Citation 173:21-174:1)
174:21-175:2	
175:25-176:3	Optional Completeness (Full Citation 175:21-176:3)
177:14-23	Optional Completeness (Full Citation 177:7-23)
178:2-5	Optional Completeness (Full Citation 177:24-178:5)
182:1-8	Optional Completeness (Full Citation 181:22-182:8)
186:5-187:21	
188:15-22	
189:2-7	
189:18-25	Optional Completeness (Full Citation 189:11-25).
192:4-14	Optional Completeness (Full Citation 192:4-15)
193:3-194:9	Optional Completeness (Full Citation 192:22-194:9)
200:21-201:7	Optional Completeness (Full Citation 199:24-200:8, 200:19-201:7)
221:6-222:7	Compound, Vague
222:16-25	
223:4-14	
223:21-224:24	224:15-24 – Leading
225:10-226:1	

Date: August 15, 2023

Respectfully submitted.

JOHN SCOTT
Provisional Attorney General

/s/ Kathleen T. Hunker
KATHLEEN T. HUNKER
Special Counsel
Tex. State Bar No. 24118415

BRENT WEBSTER
First Assistant Attorney General

RYAN G. KERCHER
Tex. State Bar No. 24060998
Deputy Chief, General Litigation Division

GRANT DORFMAN
Deputy First Assistant Attorney General

SHAWN E. COWLES
Deputy Attorney General for Civil
Litigation

WILLIAM D. WASSDORF
Assistant Attorney General
Tex. State Bar No. 24103022

OFFICE OF THE ATTORNEY GENERAL
P.O. Box 12548 (MC-009)
Austin, Texas 78711-2548
Tel.: (512) 463-2120
Fax: (512) 320-0667
kathleen.hunker@oag.texas.gov
ryan.kercher@oag.texas.gov
will.wassdorf@oag.texas.gov

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on August 15, 2023, and that all counsel of record were served by CM/ECF.

/s/ Kathleen T. Hunker
KATHLEEN T. HUNKER